

United States District Court  
for the  
Southern District of New York  
Related Case Statement

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Full Caption of Later Filed Case:

ZURU INC.,

Plaintiff	Case Number
vs.	1:23-cv-03146
THE INDIVIDUALS, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE " A" ,	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

ZURU INC.,

Plaintiff	Case Number
vs.	1:23-cv-01852-ER
THE INDIVIDUALS, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE " A" ,	
Defendant	

## Status of Earlier Filed Case:

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Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

The Court entered a preliminary injunction against the defendants remaining in the case on April 10, 2023 (DE 63). Plaintiff posted a \$5000 bond pursuant to the Court's order entered at DE 16. No defendants have appeared.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This action concerns the same plaintiff, Zuru, Inc., and defendants who, like the defendants in the earlier case, are unidentified sellers on online marketplaces like Amazon.com. The claims are the same: that the defendants are infringing Plaintiff's three registered trademarks and selling counterfeits of Plaintiff's products. Factually, the cases are near identical in that the defendants are mostly foreign defendants, many of the defendants sell their infringing products on the same marketplace as the previous case (Amazon.com), the defendants transact using the same third party payment processing companies such as PayPal, and the relief sought (injunctive relief and monetary damages) is the same relief sought in the earlier case. The interests of justice and judicial efficiency will be served by determining relatedness.

Signature: /s/ Joel B. Rothman

Date: 4/17/2023

SRIPLAW, P.A.

Firm: \_\_\_\_\_